

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

July 09, 2020

David J. Bradley, Clerk of Court

United States of America  
v.  
Paul Edward Evans, aka "Blue Diamond"

Case No. **4:20mj1213***Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2020 in the county of Harris in the  
Southern District of District, the defendant(s) violated:

*Code Section*

18 U.S.C. §1591(a)(1)(2)  
18 U.S.C. § 2421

*Offense Description*

Sex Trafficking by Force, Fraud or Coercion  
Transportation

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.*Complainant's signature*

Chris Sellers Special U.S. Dep. Marshal

*Printed name and title*

Sworn to before me telephonically.

Date: July 09, 2020*Judge's signature*City and state: Houston, Texas

U.S. Magistrate Judge Deana Hanovice Palermo

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Christopher Sellers, being duly sworn, depose and state:

I am employed as a Licensed Texas Peace Officer with the Houston Police Department in the capacity of a Senior Police Officer / Detective and have been sworn as a Special Deputy United States Marshal assigned to the Federal Bureau of Investigation. I have been a Peace Officer for approximately 24 years. I possess a Masters Peace Officer Certification under the Texas Commission on Law Enforcement Standards and Education. I am currently assigned as a Task Force Officer on the Federal Bureau of Investigation's Houston Child Exploitation Task Force (HCETF) which is tasked to investigate crimes involving sex trafficking of children. I have received numerous hours of training and education regarding the offenders of prostitution related offense and have worked side by side with similarly trained Peace Officers and Federal Agencies during this time. I have been a Task Force Officer on the Federal Bureau of Investigation's Houston Child Exploitation Task Force for approximately 2 years and have investigated human trafficking offenses for approximately 4 years. I have investigated numerous cases involving human trafficking, including sex trafficking of children, and sex trafficking of adults. I have had specialized training in investigations of child sexual abuse, Domestic Sex Trafficking, computer evidence handling and other police matters. Some of those courses included Conferences on Human Trafficking, Interviewing and Interrogation, Internet Profiling and Intelligence Gathering and Investigation of sex crimes.

1. Sex trafficking, as defined in 18 U.S.C. § 1591 (a), is:

(a) Whoever knowingly—

(1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; or

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

knowing, or, except where the act constituting the violation of paragraph (1) is advertising, in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

2. Transportation, as defined in 18 U.S.C. § 2421, is:

Whoever knowingly transports any individual in interstate or foreign commerce, or in any Territory or Possession of the United States, with intent that such individual engage in prostitution, or engage in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not more than 10 years, or both.

3. This Affidavit is made in support of a criminal complaint charging Paul Edward EVANS with violating 18 U.S.C. § 1591(a), which makes it a crime to traffic children and adults for the purpose of commercial sex and 18 U.S.C. § 2421, which makes it a crime to transport a person over state lines for the purpose of committing acts of prostitution.
4. I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and records and evidence provided to me by the Houston Police Department, and the Santa Barbara Police Department, Santa Barbara, California.
5. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of an ongoing violation of 18 U.S.C. §§ 1591(a) and 2421, has been committed by Paul Edwards EVANS, on or between October 20, 2019 through

December 28, 2019. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

6. On March 16, 2020, I, Detective Christopher Sellers, received an assignment from my supervisor, Jeanette Milazzo, Supervisory Special Agent with the Federal Bureau of Investigation's Houston Division, to conduct a follow up investigation on the Defendant Paul Edward EVANS, who was currently in the Santa Barbara County Jail, Santa Barbara, California for an incident involving Human Trafficking and Prostitution that occurred in the Southern District of Texas.
7. I requested and obtained the police report for this incident (Inc# 2019-73668) from the arresting agency, Santa Barbara Police Department, and obtained the following details from the report. On December 28, 2019, EVANS and a 18 year old female, hereafter referred to as VICTIM 1 (DOB: 10/13/2001) were both arrested in Santa Barbara, California, after Jane DOE (Identity known to law enforcement), an 18 year old female, managed to escape from them and contact 911 for help. Doe informed responding Santa Barbara Police Officers that she had joined EVANS and VICTIM 1 in Bakersfield, California, on December 26, 2019, at the request of VICTIM 1. Upon arrival, EVANS told DOE she would be required to prostitute, then set an earnings quota of \$100 an hour. DOE informed the officers on December 26, 2019, EVANS transported DOE and VICTIM 1 to Santa Barbara, California for the purpose of commercial sex. On December 28, 2019, DOE, making the decision to escape her current situation, telling EVANS and VICTIM 1 she was going to the store then called the police.

Based on this information the responding officers arrested EVANS for the California Penal code violations of Human Trafficking, Prostitution and Pandering and VICTIM 1 for violation of the California Penal Code for Pandering.

8. During a follow-up interview conducted by Santa Barbara Police Detective Kyle Crooks, VICTIM 1 provided the following information which identified her as a victim of human trafficking. VICTIM 1 informed the detective, EVANS started recruiting her to prostitute for him on or about March of 2019, when she was 17 years of age in Houston, Texas. This recruitment would take place through messaging over social media platforms, where VICTIM1 said EVANS “made the lifestyle sound good.”
9. VICTIM 1 informed Santa Barbara Police Detective Crooks, in late October 2019, she was recruited to prostitute for EVANS and described her first fourteen days with him as a time where EVANS showered her with food, money and gifts. VICTIM 1 stated on the fifteenth day, EVANS slapped her and communicated his expectations for her as his prostitute. VICTIM 1 stated EVANS expected her to earn \$400 to \$500 a day, and was expected to perform any sexual act required by those seeking her prostitution services. Should she fail to make the set quota, VICTIM 1 stated EVANS would beat her. EVANS gave VICTIM 1 three rules to govern her behavior while he was her pimp:
  - 1) Don’t disrespect him,
  - 2) Don’t swear (VICTIM1 stated Evans would hit her if she used profanity), and
  - 3) Don’t lie.

EVANS also expected VICTIM1 to provide graphic details of each prostitution date she conducted and installed a cell phone application on a phone he provided her as a means to monitor and control her movements.



10. During VICTIM 1's first two to three weeks with EVANS, she was being caused to engage in commercial sex in Houston, Texas. It was during this time, EVANS started striking her on an average of one to two times a day. VICTIM 1 stated the strikes would range from slaps to the face to EVANS striking her with full force multiple times in the chest. VICTIM 1 stated EVANS justified these assaults by telling VICTIM 1 he was making her stronger, for if she could withstand his beatings she could handle anyone. VICTIM 1 stated she believed "anyone" to mean a beating from a "John" or client.
11. In mid to late November of 2019, EVANS transported VICTIM 1 from Houston, Texas to Bakersfield, California with a stopover in Las Vegas, Nevada. VICTIM 1 stated this trip was for the purpose of her to earn money for EVANS by engaging in commercial sex. Upon their arrival in Las Vegas, VICTIM 1 stated EVANS ordered her to go out on the street and prostitute herself to earn her daily quota. VICTIM 1 stated she had never been to Las Vegas before and found herself sightseeing instead of engaging in sex dates as ordered by EVANS. VICTIM 1 stated this resulted in EVANS beating her when she returned to him without satisfying her daily monetary quota.
12. Following the stopover in Las Vegas, Nevada, VICTIM 1 stated Evans transported her to Bakersfield, California, where she was once again forced to engage in commercial sex and turn all proceeds over to EVANS. VICTIM 1 stated EVANS continued beating her for any perceived violation of the rules he established at the beginning of their union. VICTIM 1 stated many of these beatings resulted in injuries severe enough to warrant medical treatment, though, none was ever obtained. VICTIM 1 stated she was scared to ask for medical attention as the medical staff would question her about the nature of the injuries. VICTIM 1 described one such beating where EVANS struck her face with such

force it caused two lacerations to her lip, which she believed warranted sutures. VICTIM 1 had come to believe she would not be able to escape EVANS or the prostitution lifestyle as Evans kept all monies she earned and she had lost her Texas identification. VICTIM 1 stated she had made an unsuccessful attempt to flee from EVANS control while in Bakersfield, California; however, EVANS tracked her down and beat her for the failed attempt to leave him.

13. In Santa Barbara Police report #2019-73668, VICTIM 1 is listed as having provided phone number (805) 225-8546 . Upon researching this number, it was found to be held by the phone application "TextNow". Conducting an open source search on phone number (805) 225-8546, utilizing a commercial sex advertisement aggregator, I found 23 commercial sex advertisements from December 8, 2019 through December 27, 2019, with photos depicting a black female with the same physical characteristics of VICTIM 1. It is my belief the person depicted in these images is VICTIM 1. The sex advertisements were based in the cities of Santa Barbara, California, Ventura, California and Bakersfield, California.
14. I directed a subpoena be issued to the "TextNow" application, requesting the subscriber information for the person(s) utilizing the phone number (805) 225-8546 during the time period of October 1, 2019 through December 27, 2019. Upon the return of the subpoena, I found the subscriber for the time period of December 8, 2019 through December 27, 2019 to be listed as a specific moniker used by the victim associated with a particular Gmail account. This Gmail account was the same as that given by VICTIM 1 in the Santa Barbara police report.

15. Santa Barbara Police Detective Kyle Crooks conducted an open search on EVANS social media page on the Facebook platform. A Facebook page for “Dajon Evans” was observed to have multiple photos of EVANS who is identified as the author of the page, which is written in the first person narrative. Detective Crooks observed multiple postings where the page’s author made statements where he identified himself as a pimp. Furthermore, Detective Crooks observed posing where the author identified himself as using the moniker “Mr. Blue Diamond Cali P”. The detective took screen shots of these postings and placed them in evidence at the Santa Barbara Police Department. Having reviewed advertisements for sexual services where images of VICTIM 1 are provided, I found an emoji of a blue diamond used in the banner in several of the advertisements. Through my extensive training and experience as both an investigator of human trafficking and as a member of a specialized unit dealing with street level crimes, to include prostitution, I know pimps will display their “brand” in the contents of sex advertisements. As EVANS identified himself as “Mr. Blue Diamond”, I believe this emoji is EVANS attempt to digitally brand VICTIM 1 as his property. Furthermore, I know from training and experience that the use of the singular letter P, refers to “pimp”. The “Mr. Blue Diamond Cali P” posting in Facebook is EVANS identifying himself as a California Pimp.
16. I conducted a thorough criminal background check on EVANS and found he was listed in multiple Houston Police Department offense reports. In particular I found five offense reports where EVANS and a particular female whose identity is known to law enforcement, are both listed as participants in the investigated action. In two of these reports, titled for assault offenses, this particular female identifies her relationship with EVANS as that of prostitute to pimp. In one of these same offense reports, EVANS



identifies himself to Houston Police Officer H. Leyva as going by the moniker “Blue Diamond”. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Paul Edwards EVANS with a violation of 18 U.S.C. §1591(a) - Sex trafficking and 18 U.S.C. § 2421 – Transportation



Christopher Sellers  
Special Deputy – United States Marshal

Sworn to and subscribed telephonically before me this 9th day of July 2020, and I find probable cause.



Deana Hanovice Palermo  
United States Magistrate Judge